

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

Case No. 9:23-cv-81373- MIDDLEBROOKS-MATTHEWMAN

CONSUMER FINANCIAL PROTECTION BUREAU  
Plaintiff,

vs.

FREEDOM MORTGAGE CORPORATION,  
Defendant.

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**JOINT STATUS UPDATE REGARDING PLAINTIFF'S SUPPLEMENTAL RESPONSE  
TO DEFENDANT'S INTERROGATORY NO. 12**

Plaintiff Consumer Financial Protection Bureau (“Bureau”) and Defendant Freedom Mortgage Corporation (“Freedom”) (jointly, “the Parties”) submit this Joint Status Update addressing the Bureau’s Supplemental Response to Freedom’s Interrogatory No. 12 (“Supplemental Response”). The Parties are submitting this Joint Status Update in accordance with the Court’s Order Granting in Part and Denying in Part Defendant’s Motion to Compel Discovery of Information Regarding Civil Money Penalties. Dkt. 89.

In accordance with the Court’s Order, the Bureau served Freedom with its Supplemental Response on May 31. The Bureau’s Supplemental Response confirms that the Bureau is not seeking damages in this case, identifies the total civil money penalties it seeks, and the method of calculation thereof. As described in the Bureau’s Supplemental Response, while the Consumer Financial Protection Act of 2010 does not provide a precise mathematical calculation to determine the appropriate penalty in any given case, a court shall consider the statutory factors in

12 U.S.C. § 5565(c)(3) for that determination. The Bureau's Supplemental Response includes a detailed presentation of the Bureau's position concerning each of those statutory factors in this case.

The Parties met and conferred regarding the Bureau's Supplemental Response earlier on June 3. During that conferral, Freedom stated that it did not have any questions with respect to the Bureau's Supplemental Response, and that the Supplemental Response was fulsome. Freedom did not raise any objections to the Bureau's Supplemental Response.

Dated: June 3, 2024

Respectfully Submitted,

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